

EXHIBIT A

From: [Elizabeth Fegan](#)
To: icole@bakerdonelson.com; kdwyer@bakerdonelson.com
Cc: [Yujin Choi](#); [Rachel Blackburn](#); [Lipshie, Sam](#); [Olivia R. Arboneaux](#); [William J. Harbison](#); [Rodgers, John](#); [Spore, Caroline](#); [John Tate Spragens \(Other\)](#)
Subject: Jane Doe and Jane Doe 2 - Jimmie Allen
Date: Wednesday, July 19, 2023 9:47:10 AM
Attachments: [image001.gif](#)
[image002.png](#)

Good morning,

Pursuant to our meet and confer yesterday, we provide the following to help facilitate the initial collection and preservation of ESI from Mr. Allen without prejudice to additional requests we may have. We are also copying counsel for the other defendants in *Jane Doe v. WBM et al.* so that they can identify additional phone numbers or email addresses used by Mr. Allen to communicate with them.

Below is the initial set of phone numbers of which we are aware at this time that Mr. Allen used to communicate with the two plaintiffs:

1. (310) 497-0725
2. (615) 513-5353
3. (612) 255-8122
4. (629) 254-1296 - iPhone 13 Pro (is or was in LVMPD Possession)

Below are the email addresses we are aware that Mr. Allen used:

1. capelewes@icloud.com
2. jimmieallentunes@gmail.com
3. contactjimmieallen@gmail.com

However, there are likely additional phone numbers he used to communicate about or relating to our clients with his wife, the mother of his newborn children, other women he saw or was dating during the same periods, Mr. Bowers (and others at his firm), UTA, his label, his security firms, his makeup artists (etc), and other third parties. Jane Doe reports that Mr. Allen typically carried with him at least three iPhones at a time (and not always the same ones).

Further, Mr. Allen communicated with third parties under alias names and email addresses (e.g. pretending to be his assistant when he was the one responding). We request that all email accounts be preserved, even if not identified above.

ESI collection should include information stored on icloud or in other storage collections. It should also include social media. We are aware that information has been deleted or removed from public view on social media in recent months; please confirm that it has been preserved (and includes

not just public posts but also direct messages).

Finally, Mr. Allen's wife communicated with Jane Doe 2 via her phone. We ask that you collect and preserve such information to the extent it is in Mr. Allen's control or notify Ms. Gale of the need for preservation.

Please let us know if you have any questions or would like to discuss the above.

Sincerely,
Beth

Elizabeth A. Fegan | Managing Member

Fegan Scott LLC

150 S. Wacker Dr., 24th Floor

Chicago, IL 60606

Direct: 312.741.1019 | Fax: 312.264.0100

www.feganscott.com



Sports/Gaming/Entertainment Law Trailblazer, The National Law Journal 2022
Top 50 Women in Law, Chicago Daily Law Bulletin 2021-23
Illinois Super Lawyer 2016-2023